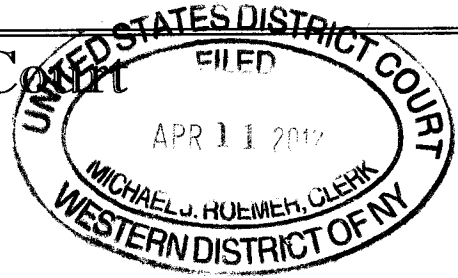


United States District Court
for the
Western District of New York



United States of America)

v.)

MICHAEL WILLIAMS,)

Defendant)

Case No. 12-MJ - 4028

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From, on or about the dates of January 4, 2012 through February 8, 2012, in the county of Monroe in the Western District of New York, the defendant violated 18 U.S.C. § 1591, an offense described as follows:

the defendant, knowingly recruited, enticed, harbored, transported, provided and obtained a person, and benefitted financially from participation in a venture, knowing the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591.

This criminal complaint is based on these facts:

- Continued on the attached sheet.

Complainant's signature

Barry W. Couch
Federal Bureau of Investigation

Printed name and title

Sworn to before me and signed in my presence.

Date: April 11, 2012

Judge's signature

City and State: ROCHESTER, NEW YORK

Honorable Marian W. Payson
United States Magistrate Judge

Printed name and title

12-mj-4028

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE)
CITY OF ROCHESTER)

I, Barry W. Couch, having been first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I have been so employed since November, 2008. I am currently assigned to investigations involving crimes against children, as well as other criminal investigations.

2. This affidavit is submitted for the limited purpose of establishing probable cause to believe that MICHAEL WILLIAMS, born in 1964, while in the Western District of New York, knowingly recruited, enticed, harbored, transported, provided and obtained a person, and benefitted financially from participation in a venture, knowing that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code Section 1591.

3. The statements contained in this affidavit are based on my own personal knowledge and observation, my training and experience, and conversations with and reports from other law enforcement officers and witnesses. Because this affidavit is

being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that MICHAEL WILLIAMS did knowingly violate Title 18, United States Code, Section 1591.

4. On February 8, 2012, officers of the Rochester Police Department responded to a residence in Rochester, New York, to investigate a report that a sixteen year-old female was missing, being held against her will, and being forced to perform sexual acts. A family member of the victim had been receiving text messages from the victim that led them to believe she was in danger. One family member had observed the victim on an online website. That family member called the telephone number listed on the escort website page and attempted to speak with the victim but the person on the other end of the phone hung up. The victim later sent text messages to that family member from the same telephone number listed on the website. One text read, "I don't want to do this but the guy who tricked me into this shit wont let me im not fuckin no one thou cause I just cant do that to myself and if I tell u where im at I will get beat." Another text message read, "Don't call me cuz theres 3 Big ass nikkaz here and they will take me xxxx and beat me if they find out its

u." Another text message read, "Im scared to leave wat if they wake up."

5. The family member showed the police the classified ad website, "Backpage.com", where the victim was observed under the name, "Ashley," and listed with a "Chrissy," and a telephone contact number of xxx-xxx-3898. The Rochester Police Department learned via Backpage.com, Facebook and intelligence reports that "Chrissy" was Chelsea Willenborg, born in 1991.

6. Rochester Police Department contacted Cricket Communications and discovered that the telephone number xxx-xxx-3898 was owned by an individual residing on Sherman Street, in Rochester. Intelligence reports showed that the upstairs of 162 Sherman Street was known for prostitution activity. Rochester Police Department officers went to 162 Sherman Street, but were met with an uncooperative occupant.

7. Rochester Police Department then referenced the Backpage.com website and located escort posts with the majority of them reading something similar to, "Hey Guys, Its Chrissy, I am 5'5, 140lbs, Blonde hair, Gorgeous Green eyes, & amazing curves. And Ashley, 5'0, 112lbs brown hair, brown eyes. We offer D.O.U.B.L.E.S! Our pictures are 10000% REAL! WE DO NOT send

pictures, because ours are real! CHECK REVIEWS We do NOT answer private calls Please NO GAMES! SERIOUS CALLERS ONLY! Prices are NON-Negotiable!b> Call now! Txt if shy. Chrissy~xxx-xxx-3898
Poster's age: 19 Location: Rochester, My place? Southwedge.....Or Yours?" One of posts showed three photos of the victim as "Ashley" posing in revealing clothing along with photos of "Chrissy." A Facebook page for Chelsea Willenborg was also observed having one picture of Chelsea that was observed on the Backpage.com website for "Chrissy" as well.

8. Rochester Police Department learned that Chelsea Willenborg was on probation and had listed an address of 204 Caroline Street as her residence. Rochester Police Department officers went to 204 Caroline Street. MICHAEL WILLIAMS was encountered at 204 Caroline Street and stated that his girlfriend, Chelsea Willenborg, lived there. While at the residence, officers observed an open laptop computer. The laptop screen appeared to show a Rochester Tonight Backpage conversation outlining a meeting agreement between a user named "MASCH69" and "CUTECHRISSY9." "CUTECHRISSY9" was believed to be Chelsea Willenborg. The message referred to an agreement to have an intimate meeting with the escort customer for money and that "CUTECHRISSY9" was bringing her friend as well. The meeting was

set for 9:30 P.M. at the Best Western Hotel on Jefferson Road, Room 239.

9. Rochester Police Department officers responded to the Best Western Hotel at 940 Jefferson Road. At Room 239, a partially clothed adult male was encountered who indicated there were two girls there in the room. The two girls were in the bathroom, and after being directed by officers to come out, took several minutes to come out. It was obvious to the officers that the girls were getting dressed. One of the girls was the victim and the other was Chelsea Willenborg.

10. The victim, through a written deposition, communicated that a few weeks prior, she was staying at her friend, Terrell's house on Sherman Street and began to walk to her boyfriend's house on Lake Avenue. Terrell stopped her and told her not to walk because it was cold and he would get her a ride. Shortly thereafter, the victim and Terrell got into a blue pickup truck. Terrell told the victim that the driver could help her situation and give her a place to stay permanently. The driver, who the victim later became aware of as having a nickname of "Good Game" and a first name of Michael, soon dropped off Terrell and transported the victim to an apartment on Caroline Street.

11. When they got into the apartment, the victim met Chelsea Willenborg. Chelsea told the victim that she could live there with her and Michael and that she would take care of her and help her. While the three of them talked, Michael and Chelsea asked the victim how old she was and the victim told them that she was sixteen years-old. The victim spent the night at the apartment on Caroline Street.

12. The following day, Michael brought the victim a short dress and told her to put it on. After she put the dress on, Michael and Chelsea wanted to take pictures of her. She felt uncomfortable and thought they might put the pictures of her on the computer, but she did not know what to say. Chelsea started to move her into different positions and take pictures of her. The following day, the victim saw that they had put the pictures of her on a website called "Backpage," a classified advertisting type of website.

13. After a few days, the victim asked to go to school. Michael told her that going to school was not an option. Chelsea asked Michael if the victim could get a G.E.D. and Michael said yes to that. The victim then asked for a ride to see her boyfriend and Michael told her that was not an option either. Michael then said that the victim could not go anywhere. Later,

Chelsea told the victim that if the victim tried to leave, Michael would beat her (Chelsea) up and leave her. The victim did see Michael hit Chelsea a few times. The victim said she was very scared of Michael, that he hit Chelsea hard, and she did not want Michael to hit her or Chelsea. The victim reiterated that she was afraid of Michael and what he would do to Chelsea and her if she tried to leave.

14. After about a week, people started to call the phone number that was listed on the Backpage website with the victim's pictures on it. Soon, someone wanted the victim to be his escort. Chelsea always handled the phone calls and arranged for the man to come over to the apartment. The man came over, lied down on a mattress on the floor and tried to kiss the victim. The man then started to touch the victim's vagina through her clothes. The man then pulled out his penis and masturbated himself.

15. The victim stated that she did not want to do what Michael and Chelsea were having her do, but was scared to try and leave and did not know what to do. Over the next week, the victim saw about eight or nine different guys. Sometimes the guys would come over to Michael and Chelsea's apartment, and sometimes the victim and Chelsea would go to them. There were a

few times that the victim gave oral sex to men. She stated that she felt pressure from Michael and was scared he would get mad if any of the guys complained, so that was why she provided the oral sex.

16. The victim never knew how much money Michael and Chelsea charged the guys, but she did see the guys give money to Chelsea a few times. Chelsea would then always give the money to Michael.

17. The victim stated that on February 8th, Chelsea and she got a call to meet a guy at the Best Western Hotel. Chelsea drove the two of them there. Once at the hotel, they met a guy and he took them to his room. The guy gave Chelsea \$300 for an hour with them. They talked for a while and then all got naked and into the hot tub. Shortly thereafter, the police arrived. The victim and Chelsea then went into the bathroom and put their clothes back on.

18. Investigators showed the victim pictures and the victim identified Michael. The victim was then told that the picture was of MICHAEL WILLIAMS.

19. In a written deposition, the adult male referenced in paragraph 17 of this affidavit, M.S., stated that he had gone

onto the website Backpage.com and made contact with "Chrissy." Chrissy was providing escort services. M.S. agreed to the "Valentine Special" for \$300. Chrissy said she had a friend and asked if she could come along. The friend was identified as "Ashley." M.S. said that he, Chrissy and Ashley did get into the hot tub and lay on the bed.

20. As a result of a search warrant issued by the Honorable John L. DeMarco, for information contained within a cellular telephone identified as belonging to MICHAEL WILLIAMS, text messages between MICHAEL WILLIAMS and Chelsea Willenborg revealed some of the involvement of WILLIAMS and Willenborg in the escort/prostitution activities. As an example, one text message on January 28, 2012, from Willenborg's phone to WILLIAMS' phone read, "Ok so if I get an outcall u guna take me?~Mr\$.GoodGaMe". An apparent response from WILLIAMS' phone to Willenborg's phone read, "Yea as long u stop tripping I will. Have my son. Drive. U". Another text message on January 28, 2012, from Willenborg's phone to WILLIAMS' phone read, "are u going to have her do doubles still or not someone txin me about one". An apparent response from WILLIAMS' phone to Willenborg's phone read, "Yea set it up". A text message on February 4, 2012, from phone number xxx-xxx-3898, the phone number referenced in paragraphs 5 and 7 of this affidavit, to WILLIAMS' phone read, "? Should I

post?" Another text message sent to WILLIAMS' phone from phone number xxx-xxx-3898 on January 4, 2012, read, "Just so u kno. I did make some money last night. And someone comin at 1230 another at 1:15 we need to talk".

21. Your affiant interviewed the victim on or about April 2, 2012. She indicated that she first met Michael Williams and another individual named "Juan" when she was living with Terrell. One day, Juan told her that Michael could set the victim up with her own apartment and on that date, Michael drove ^{the vicinity of home} to Terrell's ~~apartment~~ in a blue pickup truck and eventually drove her (and Juan) to the location on Caroline Street.

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22. The victim further admitted that not only did she engage in oral sex, but she engaged in vaginal sex too. The victim stated that she had been set up with between 20 to 30 men during the time she was with Michael and Chelsea. At first, she would not agree to touch the men and the first few men raped her. After that, she ended up engaging in oral and vaginal sex with the men she had been set up for dates with. She was too scared to keep any of the money the men gave her.

23. The victim told your affiant that she was able to remember the pricing that had been arranged: \$100 for half an

hour, \$160 for an hour and \$200 for both her and Chelsea together. At times, the victim would engage in oral and vaginal sex at the same time that Chelsea was in the room. On one occasion, the victim was engaging in sex with a customer named "Raphael". When "Raphael" became more interested in the victim than Chelsea, Chelsea banned him from being a customer.

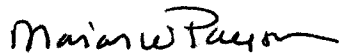
24. The victim indicated that typically she would get the money from the men she had been set up for dates and she would give the money to Chelsea and then Chelsea would give the money to Michael.

Based upon the foregoing, your affiant respectfully submits that there is probable cause to believe that MICHAEL WILLIAMS has violated Title 18, United States Code, Section 1591, knowingly recruiting, enticing, harboring, transporting, providing and obtaining a person, and benefitting financially from participation in a venture, knowing that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.



BARRY W. COUCH
Special Agent
Federal Bureau of Investigation

Sworn to before me this
11 day of April, 2012.



HON. MARIAN W. PAYSON
United States Magistrate Judge